

**NOTICE TO TAKE DEPOSITIONS; NOTICE OF DISCOVERY REQUESTS AND
DISCLOSURES**

UNANSWERED DEPOSITION NOTICES

Chelsea Davis has sent subpoenas, notices of depositions, and discovery requests to McKool Smith P.C., Leslie Ware and Harlan Crow. They failed to respond to each subpoena and request and failed to appear for their depositions, except that Harlan Crow did respond to requests for admissions with objections only.

CHELSEA DAVIS'S AVAILABILITY TO BE DEPOSED

Chelsea Davis has provided numerous dates on which she is available for anyone to take her deposition, but no one has contacted her to schedule her deposition. Chelsea Davis is available to be deposed on any day, at any time, and at any place. She begs attorneys for Harlan Crow, Samuel Baxter, McKool Smith P.C. and Leslie Ware to take her deposition.

DESIGNATION OF EXPERT WITNESSES

Chelsea Davis provides notice of FIVE expert witnesses on the following topics:

sex trafficking in the workplace, sexual assault in the workplace, sexual abuse of professional women in the workplace, the devastating damages caused to victim Chelsea Davis as a result of being sexually harassed in the workplace by Samuel F. Baxter, the damages to the public health and welfare caused by Samuel F. Baxter and McKool Smith P.C., the damages to the public health and welfare caused by sexual harassment of Chelsea Davis and behaviors demeaning to women in the workplace, at McKool Smith P.C., and especially at law firm McKool Smith P.C..

CHELSEA DAVIS'S DISCLOSURES

Chelsea Davis provides the following, which are available for inspection and copying at any time by appointment made with Chelsea Davis and by public record requests:

1. Communications, whether electronic or hard-copies, including text messages, emails, letters, instant messages and other for McKool Smith P.C. of writing, to and from Samuel Baxter, Harlan Crow, McKool Smith P.C. and Leslie Ware evidencing human trafficking.
2. Audio recordings, photographs, videos or other images (including digital images) of Leslie Ware and Samuel Baxter evidencing human trafficking.
3. Sexual abuse counseling records of Chelsea Davis evidencing human trafficking.

4. Documents showing damages complained of evidencing human trafficking and damages as a direct and proximate result.
5. Police Reports, 9-1-1 phone call recordings of assaults and sexual assaults at issue evidencing human trafficking.
6. Financial records of all monies paid to Chelsea Davis by Leslie Ware, Samuel Baxter, Harlan Crow and McKool Smith P.C. for forced labor and sexual conduct evidencing human trafficking.
7. Handwritten Notes evidencing human trafficking..
8. Internet postings evidencing human trafficking.
9. Attempted filings of lawsuits, police reports and complaints with the Texas Rangers, Dallas Police Department, Collin County Sheriff's Department, and FBI evidencing human trafficking.
10. Numerous Contracts from attorneys and law firm McKool Smith P.C. agreeing to take case for human trafficking on a contingency fee basis.
11. Medical expenses
 - a. 2010 spreadsheet of medical expenses evidencing sexually transmitted diseases, assault and sexual assault
 - b. 2011 spreadsheet of medical expenses evidencing sexually transmitted diseases, assault and sexual assault
 - c. 2012 spreadsheet of medical expenses evidencing sexually transmitted diseases, assault and sexual assault
 - d. 2013 spreadsheet of medical expenses evidencing sexually transmitted diseases, assault and sexual assault
 - e. 2014 spreadsheet of medical expenses evidencing sexually transmitted diseases, assault and sexual assault
12. Expenses relating to Car Chase and Car Wreck evidencing human trafficking
 - a. Progressive insurance records of car totalled
 - b. Pictures of Totalled Car at Presbyterian Hospital
 - c. Pictures of bruises taken by staff at Presbyterian Hospital
13. Expenses and records relating to Drugging and DWI evidencing human trafficking
 - a. Car insurance
 - b. Attorney fees
 - c. Towing expenses
 - d. Text message from McKool Smith P.C.'s agent admitting to drugging me and following up to see if I was okay.
14. Statements from other women who Leslie Ware and Samuel Baxter have assaulted evidencing human trafficking.
15. Witness statements evidencing human trafficking.
16. Copies of checks made to Chelsea Davis from Leslie Ware.

17. Contract signed by Leslie Ware.
18. Contract signed by local counsel for McKool Smith P.C.
19. In-car DVD's from false arrests.

NOTICE TO TAKE DEPOSITIONS

Chelsea Davis seeks to take the depositions of and hereby notices the depositions of all parties and third-parties, including Harlan Crow, Samuel Baxter, McKool Smith P.C. and Leslie Ware.

Chelsea Davis hereby notices the depositions of non-parties, including Dr. Gregg Small, Terri Roberts, Chelsea Davis's family, Chelsea Davis's friends, employees and former employees of The Ware Firm, Crow Holdings Capital Partners LLC, PanOptis Patent Management LLC and McKool Smith P.C.

DEPOSITION TOPICS

Deposition is requested on the following matters:

- Joint ventures of McKool Smith P.C. and shareholders of McKool Smith P.C.
- All benefits received by McKool Smith P.C. and shareholders of McKool Smith P.C.
- The recruiting, hiring, employment and termination of employment of Chelsea L. Davis.
- All payments, offers to pay, reimbursements, wages, and financial transactions between McKool Smith P.C. and Chelsea L. Davis
- McKool Smith P.C. events.
- Lawsuit(s) against McKool Smith P.C., past or current employees of McKool Smith P.C. and past or current attorneys of McKool Smith P.C.
- Sexual conduct at the offices of McKool Smith P.C., apartments or other buildings leased by McKool Smith P.C. or on behalf of McKool Smith P.C.

- Third party financing of McKool Smith P.C.
- McKool Smith P.C.'s relationship with Adam S. Day
- McKool Smith P.C.'s relationship with Glenn A. Perry
- McKool Smith P.C.'s relationship with Johnny Ward and Ward & Smith Law Firm
- Clients and potential clients of Chelsea Davis P.C. from McKool Smith P.C.
- Chelsea Davis P.C.
- McKool Smith P.C.'s relationship with Chelsea Davis P.C.
- Associate salaries of male associates verses female associates and other evidence of wage discrimination
- Associate surveys of associate dissatisfaction
- Evidence of Lack of Diversity at McKool Smith P.C. historically through the end of 2010 and January 2011.

DEFINITIONS

The following Definitions apply to this entire document:

1. "Deviate sexual intercourse" means any contact between the genitals of one person and the mouth or anus of another person.
2. "Prostitution" means the offense defined in Texas Penal Code Section 43.02.
3. "Sexual contact" means any touching of the anus, breast, or any part of the genitals of another person with intent to arouse or gratify the sexual desire of any person.
4. "Sexual conduct" includes deviate sexual intercourse, sexual contact, or sexual intercourse.
5. "Sexual intercourse" means any penetration of the female sex organ by the male sex organ.

INTERROGATORIES

1. Identify all benefits received by McKool Smith P.C. and any person acting on behalf of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow from April 2010 to January 2011 by receiving labor or services, from April 2010 to January 2011, including from participating in a venture that involves trafficking of persons.

2. Identify all payments made by McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow or by any person acting on behalf of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow to a person with whom an employee, a partner, or a shareholder of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow engaged in sexual conduct from April 2010 to January 2011.

3. Identify all persons known to McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow (or known to any person acting on behalf of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow) solicited by McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow or any person acting on behalf of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow to engage in sexual conduct for compensation from April 2010 to January 2011.

4. Identify all shareholders and past or present employees of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow who have committed one or more offenses prohibited by: Texas Penal Code Section 43.02 (Prostitution); Section 43.03 (Promotion of Prostitution); Section 43.04 (Aggravated Promotion of Prostitution); or Section 43.05 (Compelling Prostitution), whether or not the person had the requisite intent and whether or not the person has been prosecuted for the offense from April 2010 to January 2011.

5. Identify, by name, title, residence and business address(es) (if employed by McKool Smith P.C., Samuel Baxter, Leslie Ware or Harlan Crow, so state, as well as in what capacity) all persons known to McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow (or known to any person acting on behalf of McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow) who saw, witnessed, viewed or heard photographic, videotape or other pictorial or sound recording(s) of Chelsea L. Davis or one or more or part of voicemails capturing the voice, whether original, modified or enhanced, of Chelsea L. Davis from April 2010 to January 2011.

6. Identify, by name, title, residence and business address(es) all persons providing a statement or document, witnesses, experts, and deponents, whether the statement(s) is/was/were/are written or oral, and, if written, identify all persons in possession, custody and/or control of such statement(s).

7. Identify all motion(s) and application(s) for injunctive relief filed by or on behalf of McKool Smith P.C., an employee or agent of McKool Smith P.C., Samuel Baxter, Leslie Ware or Harlan Crow, the case/cause number(s), the filing date, the court(s), the parties, the filing date, the attorneys of record and the specific basis for the court's subject matter jurisdiction.

8. Identify, by name, title, residence and business address(es), all persons known to McKool Smith P.C., Samuel Baxter, Harlan Crow, and Leslie Ware (or known to any person acting on his/her/its behalf) who have complained or made a claim or complaint or petition or application of assault, sexual assault, sexual harassment, wrongful termination, wage discrimination, trafficking of persons, or compelling prostitution against McKool Smith P.C., an

employee of McKool Smith P.C., Samuel Baxter, Harlan Crow, or Leslie Ware, the date of the complaint, the person or entity to whom the complaint was made, the person against whom the complaint was made, the complaint and the cause number or identification number of the complaint.

9. Identify all persons, businesses, clients, attorneys and matters referred to Chelsea Davis P.C. by McKool Smith P.C., Samuel Baxter, Leslie Ware and Harlan Crow.

10. Describe in detail the reasons why McKool Smith P.C. hired Chelsea Davis.

11. Describe in detail the cause for which Chelsea L. Davis was terminated.

REQUESTS FOR PRODUCTION

1. All photographs, video recordings and voice recordings that include the likeness and/or the voice of Chelsea Davis.

2. All electronic and account records of Chelsea Davis's account on McKool Smith P.C.'s server, including cdavis@mckoolsmith.com, all calendar entries, time records, timesheets, notes, events, phone records, and voicemails received at the office phone number assigned to Chelsea L. Davis.

3. For any private investigator and any consulting expert whose mental impressions or opinions have been reviewed by a testifying or non-testifying expert, all documents, tangible things, reports, models or data compilations that have been provided to, reviewed by or prepared by or for such person in anticipation of a report or testifying expert's testimony.

4. All documents, exhibits and things presented to a magistrate judge or presiding judge on an ex parte basis.

REQUESTS FOR ADMISSION

1. Admit that Samuel F. Baxter forced Chelsea Davis, by force, fraud or coercion, to engage in sexual conduct with him during her employment with McKool Smith P.C.
2. Admit that Samuel F. Baxter knowingly solicited Chelsea L. Davis to engage in sexual conduct with another during her employment with McKool Smith P.C.
3. Admit that McKool Smith P.C. received information about Chelsea L. Davis from Leslie D. Ware by any means prior to or during her employment with McKool Smith P.C.
4. Admit that Samuel F. Baxter asked Chelsea L. Davis to engage in sexual conduct with Leslie D. Ware.
5. Admit that Samuel F. Baxter referred Johnny Ward to Chelsea L. Davis.
6. Admit that McKool Smith P.C. financially benefits from Leslie Ware.
7. Admit that Leslie Ware and McKool Smith P.C. financially benefit from Harlan Crow.

Dated: Nov. 14, 2014

Respectfully,

/s/Chelsea L. Davis
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CERTIFICATE OF SERVICE

I electronically submitted the foregoing document using the electronic case filing system. I hereby certify that I have served all counsel and/or pro se parties of record (or non-record) electronically by email or, as a pro-se party, on the date it is electronically docketed in the court's CM/ECF system, as authorized by the Federal Rule of Civil Procedure 5(b)(2) and the Local Rules of this Court (in the Eastern District of Texas), or otherwise, to the extent possible.

Dated: Nov. 14, 2014

/s/Chelsea L. Davis

Chelsea L. Davis, pro-se

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